

**REMARKS**

Claims 1-30 are pending. Claims 1-30 were rejected. Independent claims 1, 19, 24, and 30 were rejected under 35 U.S.C. 102(e) as being anticipated by (U.S. Patent No. 6,080,201) Hojat.

The Examiner identified particular portions of the specification and particular language in the claim interpretation section of the Office Action. It should be noted, however, that the claims not be fully interpreted without considering plain meaning, the specification in its entirety, and/or other intrinsic evidence.

The independent claims of the present invention were rejected using Hojat. Hojat describes a "method for improving timing convergence in computer aided semiconductor circuit design" (Abstract). Hojat describes extracting "information from the placement state provided to determine the lengths of individual nets after placement" (8:54-57). "Of course, after the first few cuts, the partitions will be large and each partition will contain multiple placeable objects. When there is more than one placeable object in a partition, each object is presumed to be in the center of the partition. In this case, the synthesizer utilizes conventional statistical models to determine the net lengths for nets connecting objects in the same partition. For objects in different partitions, the synthesizer uses conventional maze routing schemes to determine the netlengths" (8:61-9:2).

However, Hojat does not teach or suggest determining a statistical estimate for a "future" delay corresponding to a "future" connection placed across a boundary. By contrast, the independent claims 1, 24, and 30 all variably recite "determining a statistical estimate for a future delay" associated with a "future connection" to be placed across a "second boundary." Independent claim 19 recites generating "statistical estimates" for "future delays" on "uncut connections." According to various embodiments, the techniques of the present invention allow more accurate estimation of "delays for connections which have not yet been placed" (page 6, lines 4-5).

Hojat only describes "statistical models to determine the net lengths for nets connecting objects in the same partition" and "maze routing schemes to determine the netlengths" for nets

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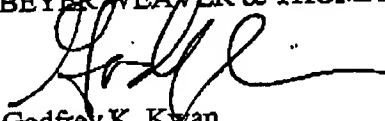
Attorney Docket No.: ALTRP061/A637

9

connecting objects in "different partitions" (8:61-9:2). There is no mention or suggestion of estimating "future" delays for "future" or "uncut" connections.

In light of the above remarks, the rejections to the independent claims are believed overcome for at least the reasons noted above. Applicants believe that all pending claims are allowable in their present form. Please feel free to contact the undersigned at the number provided below if there are any questions, concerns, or remaining issues.

Respectfully submitted,  
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